

JEROME BAUMGARTNER 12/19/2018

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1 IN THE UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MISSOURI
3 EASTERN DIVISION
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5
6 MALEEHA AHMAD, et al.,)
7 Plaintiffs,)
8 vs.) Cause No.
9 CITY OF ST. LOUIS, MISSOURI,) 4:17-cv-2455-CDP
10 Defendant.)

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DEPOSITION OF JEROME BAUMGARTNER
Taken on behalf of the Plaintiff
December 19th, 2018

Jamie Jo Kinder, CCR 842, CSR 084.003306

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7 CITY OF ST. LOUIS, MISSOURI,) 4:17-cv-2455-CDP
8 Defendant.)
9

10 DEPOSITION OF WITNESS, JEROME BAUMGARTNER,
11 produced, sworn, and examined on the 19th day of December,
12 2018, between the hours of 1:22 o'clock in the afternoon
13 and 2:31 o'clock in the forenoon of that day, at St. Louis
14 City Hall, 1200 Market, Room 314, St. Louis, MO, before
15 Jamie Jo Kinder, Missouri CCR 842, Illinois CSR 084-00306,
16 a Certified Court Reporter within and for the State of
17 Missouri, in a certain cause now pending before the United
18 States District Court, Eastern District of Missouri,
19 Eastern Division, wherein MALEEHA AHMAD, et al., are the
20 Plaintiffs, and CITY OF ST. LOUIS, MISSOURI is the
21 Defendant.
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1 A P P E A R A N C E S

2 For the Plaintiffs:

3 Ms. Jessie Steffan
4 AMERICAN CIVIL LIBERTIES UNION OF MISSOURI
5 906 Olive Street, Suite 1130
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9 For the Defendant:

10 Ms. Abby Duncan
11 St. Louis City Counselor's Office
12 1200 Market, City Hall, Room 314
13 St. Louis, MO 63103

14 The Court Reporter:

15 Ms. Jamie Jo Kinder, CCR, CSR
16 ALARIS LITIGATION SERVICES
17 711 North Eleventh Street
18 St. Louis, MO 63101
19 (800) 280-3376
20 www.alaris.us
21 transcripts@alarislitigation.com
22
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24
25

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1 (Deposition commenced at 1:22 p.m.)

2 IT IS HEREBY STIPULATED AND AGREED, by and between
3 counsel for Plaintiffs and counsel for Defendant, that the
4 deposition of JEROME BAUMGARTNER may be taken in shorthand
5 by Jamie Jo Kinder, CCR, CSR, a notary public and shorthand
6 reporter, and afterwards transcribed into typewriting; and
7 the signature of the witness is expressly reserved.

8 * * * * *

9 JEROME BAUMGARTNER,
10 of lawful age, being produced, sworn and examined on
11 behalf of the Plaintiffs, deposes and says:

12 EXAMINATION

13 QUESTIONS BY MS. STEFFAN:

14 Q Good afternoon, Mr. Baumgartner.

15 A Hello.

16 Q I introduced myself earlier, but I'm Jessie
17 Steffan. I'm one of the plaintiffs' attorneys, which is
18 Ahmad versus the City of St. Louis. I'm going to ask you
19 to state and spell your name for the record?

20 A Jerome, J-E-R-O-M-E, Baumgartner,
21 B-A-U-M-G-A-R-T-N-E-R.

22 Q Have you been deposed previously?

23 A For this case?

24 Q For any case.

25 A Yes.

1 an --

2 A There was text in the e-mail.

3 Q Do you recall what it said?

4 A Not clearly enough to be able to state it
5 here.

6 Q Do you know how long the text of the e-mail
7 was?

8 MS. DUNCAN: Object as to vague. Subject to
9 that, you can answer.

10 A A few sentences.

11 Q (By Ms. Steffan) Do you recall when that was
12 disseminated through e-mail?

13 A I don't.

14 Q Did you read it at that time?

15 A Yes.

16 Q Did you do anything differently in your work
17 as a result of having read that preliminary injunction?

18 A No.

19 Q Do you think the injunction was applicable to
20 your office's work?

21 MS. DUNCAN: I'm going to object as to vague.
22 Subject to that, you can answer.

23 A Applicable in a sense that the subject area
24 content may come back to us for some type of policy work
25 eventually.

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1 Q (By Ms. Steffan) Did you discuss the
2 preliminary injunction with anyone after you received it
3 from the chief via e-mail?

4 A No.

5 Q You didn't propose any special order
6 amendments or other policy changes as a result of the
7 preliminary injunction; is that correct?

8 A Yes.

9 Q To your knowledge, did anyone in your office
10 propose any changes to policies or special orders as a
11 result of the preliminary injunction from the Ahmad case?

12 A No.

13 Q To your knowledge, they did not?

14 A To my knowledge, they did not.

15 MS. STEFFAN: That's all I have.

16 MS. DUNCAN: I have no questions. Sir, you
17 can either waive your signature or read, which entails
18 waiting until the transcript is written out and then you
19 can look over it and make sure all of your answers are
20 correct. If there is any typos, you need to correct or you
21 can waive your signature. In this case, I would suggest
22 that you read it.

23 THE WITNESS: I will read it.

24 MS. STEFFAN: A PDF, that's all I need.

25 MS. DUNCAN: Etrans with the exhibits.